



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CP/LXN  
F#2009R01981

271 Cadman Plaza East  
Brooklyn, New York 11201

August 24, 2011

By ECF & First Class Mail

Susan Kellman, Esq.  
25 Eighth Avenue  
Brooklyn, New York 11217

Re: United States v. Carr  
Criminal Docket No. 11-454 (ARR)

Dear Ms. Kellman:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery for defendant Lawrence Carr with respect to the above-captioned case. Any additional discovery will be provided to you as it becomes available. The government hereby also requests reciprocal discovery.

**A. The Defendant's Statements**

Redacted reports containing the defendant's statements are enclosed bearing Bates numbers LC 0000001-32.

**B. The Defendant's Prior Record**

Documents reflecting the defendant's criminal history are enclosed, bearing Bates Number LC 33-43.

**C. Other Tangible Evidence**

As further evidence becomes available, it will be turned over in discovery.

**D. Reports of Examinations and Tests**

The government will provide you with copies of any reports of examinations or tests in this case, as they become available.

**E. Expert Testimony**

The government will comply with Rule 16(a)(1)(E) by notifying you in a timely fashion of the identity of this expert and any additional experts that the government intends to call at trial. At that time, the government will also provide a summary of the opinion and qualifications of any experts.

**F. Brady Materials**

The government is not aware of any exculpatory material regarding the defendant. The government understands and will comply with its continuing obligation to produce exculpatory material as defined by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny.

Before trial, the government will furnish materials discoverable pursuant to Title 18, United States Code, Section 3500, as well as impeachment materials. See Giglio v. United States, 405 U.S. 150 (1972).

**G. Other Crimes, Wrongs or Acts**

The government will provide the defendant with reasonable notice in advance of trial if it intends to offer any material under Federal Rule of Evidence 404(b).

**H. The Defendant's Required Disclosures**

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, photographs, tapes, tangible objects, or copies or portions thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results of reports or physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely upon at trial or which were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid any unnecessary delay, we request that you have copies of these statements available for production to the government no later than the commencement of trial.

The government also requests that the defendant disclose a written summary of testimony the defendant intends to use under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for those opinions, and the witnesses' qualifications.

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By: /s/ Lan Nguyen  
Carolyn Pokorny/Lan Nguyen  
Assistant U.S. Attorneys  
(718) 254-6291/6162

Enclosures

CC: Clerk of Court (ARR) (w/out enclosures)